



Association of California Water Agencies

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Paul Dabbs, Chief
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Statewide Water Planning Branch
California Department of Water Resources
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ACWA Comments on Public Review Draft California Water Plan Update 2005

Dear Mr. Dabbs:

The Association of California Water Agencies (ACWA) appreciates the opportunity to provide comments on the Public Review Draft of the California Water Plan Update 2005 (Update 2005). ACWA understands that the California Water Plan seeks to be “a framework for water managers, legislators, and the public to consider options and make decisions regarding California’s water future.” This document is expected to “guide the orderly and coordinated control, protection, conservation, development, management and efficient use of the water resources of the state (Water Code, Section 10005(a)). It consists of five volumes that include a strategic plan, basic water resources information and data on water supplies and uses, and identification of existing and proposed statewide demand management and water supply augmentation programs and projects.

ACWA represents over 440 public water agencies in California. Our members supply over 90% of the water delivered in California for domestic, agricultural and industrial uses. ACWA’s mission is to assist its member in promoting the development, management and reasonable beneficial use of good quality water at the lowest practical cost in than environmentally balanced manner. Our members work interdependently with the State to provide Californians with the safe, reliable, and affordable water necessary to sustain our communities, and ensure a strong economy and a healthy environment.

As you know, water professionals from many ACWA member agencies have worked cooperatively with Department of Water Resources (DWR) staff over several years as Update 2005 was being developed. Water professionals have served on DWR’s

Public Advisory Committee, its Extended Review Forum, and in other capacities to provide input and content to help strengthen Update 2005. Yet the Update reflects the interests and perspectives of many other stakeholders, DWR staff, and others as well. We recognize that Update 2005 is a product of the unique process that was used in its development.

The ACWA “Blueprint” and Update 2005

During the time that Update 2005 was being drafted, ACWA members were working together to articulate a forward-looking action plan to address the key water policy concerns that California now faces. Released in May 2005, “No Time to Waste: A Blueprint for California Water” (ACWA Blueprint), concisely describes the key issues and decision-making that will be required to ensure our water supply system remains viable for future generations. We believe the ACWA Blueprint is complementary to Update 2005.

The ACWA Blueprint was developed with input from public water agencies throughout the state to serve as a roadmap for state and federal leaders to ensure California has the water system it will need. It contains 12 recommendations that include a diverse mix of actions that include improving the existing water conveyance system in the Sacramento-San Joaquin River Delta; evaluating long-term threats to Delta levees and pursuing actions to reduce risks to the state’s water supply and the environment; developing additional groundwater and surface water storage; and supporting and funding local efforts to expand recycled water use, water use efficiency and desalination of seawater and brackish groundwater. The ACWA Blueprint and helpful summary materials can be found at <http://www.acwa.com/issues/blueprint>.

ACWA believes that both Update 2005 and the ACWA Blueprint provide a similar clear-eyed, relatively objective view of the current state of California water. Regional accomplishments and needs are recognized, and a variety of solutions and measures are identified in both documents. Clearly, Update 2005 provides a wider scope of assessment and greater technical detail that may be used to understand the key issues and policy debates that currently frame California water policy. But the ACWA Blueprint provides a strategic assessment and clear policy recommendations that call for immediate action on many fronts.

With the conclusions of the ACWA Blueprint in mind, we provide the following high-level comments on Update 2005.

ACWA Comments on Update 2005

1. ACWA strongly endorses the DWR’s new emphasis in Update 2005 on identifying regional water issues and promoting integrated regional water management. ACWA members, and the water community as a whole, have been leading in the management of water resources for at least a decade and are now seeking to encourage the state and federal governments to re-engage in water issues. Essentially all of the significant water management and development projects that have implemented during this time have been local, although many regional cooperative models are also contributing to California’

water security and reliability. We look forward to partnering with DWR to get more detailed and dynamic integrated regional water management plans in place to better leverage, guide and coordinate future local efforts that would benefit from such partnership.

2. ACWA is concerned that the traditional function of Bulletin 160 to identify the state's future water needs is not clearly met in Update 2005. We recognize that DWR and its Public Advisory Committee determined that water supply and use data are lacking to do a comprehensive quantitative analysis to estimate water needs under various scenarios. But we feel that the lack of some form of the so-called "gap analysis" hampers the usefulness of Update 2005. We are particularly concerned that Update 2005 fails to characterize the magnitude of the State's dire water supply and reliability situation during the next and subsequent multi-year droughts.
3. ACWA is concerned that Update 2005 does not contain strong enough commitment to rebuilding and enhancing the state's backbone water system infrastructure, as called for in ACWA's Blueprint. Specifically:
 - a. Update 2005 must clearly call for state development of new surface and groundwater storage now for statewide benefit; and
 - b. Update 2005 must clearly commit the state to actively facilitating regional and local projects to enhance water reliability statewide.
4. Update 2005 correctly identifies the need for increased water conservation and reuse in all sectors as among the many water resource management strategies. An "either/or" choice between aggressive water conservation and reuse and investment in new or re-developed water supply and management projects is a false choice for most local water agencies. Rather, cost effective local efforts to further conserve and reuse water must continue to be implemented, *while at the same time* new water supplies must be developed to ensure a secure water future for our growing and dynamic state. Update 2005 needs to be revised to clearly reject the premise that water conservation and reuse alone will meet California's future needs.
5. ACWA believes that Update 2005 must more clearly emphasize a proactive state response to seemingly significant emerging threats to our water supply and system: climate change, groundwater pollution, and xenobiotic contaminants, to name a few of the emerging issues that need to be addressed.
6. Update 2005 does not focus enough specific attention to hard realities facing the Sacramento-San Joaquin Delta and our water system:
 - a. There is not enough emphasis on the reality that the Delta is the essential, yet highly vulnerable crux of the state's backbone water system; and

- b. There is not enough recognition that the Delta's physical processes (oxidizing soils, decreasing levee stability, significant earthquake threat, and increasing sea level), and its ecological processes (fish population indicators, invasive species impacts) demand a focused, immediate, and unprecedented response.
7. ACWA calls on DWR to revised Update 2005 to embrace ACWA's call for a high-level, gubernatorial appointed commission to examine and develop an immediate and comprehensive response to the Bay-Delta situation.

ACWA has encouraged its member agencies to directly submit other comment letters that address many issues and concerns specific to their interests. ACWA asks DWR to consider and address all of the concerns expressed above and all subsequent comments by the water community, which we believe will help improve Update 2005.

We sincerely appreciate the hard work of DWR staff and its consultants during the Update 2005 drafting process, and we look forward continuing to work cooperatively with the state on future California Water Plan updates. We look forward to working with DWR and other stakeholders to help steward the water resources of the state for bright and sustainable future.

Sincerely

[Original signed by]

David Bolland
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